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Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

| | | |
|---------------------------|---|-------------------------------|
| UNITED STATES OF AMERICA, |) | |
| |) | No. 3:20-cr-00343-IM-1 |
| Plaintiff, |) | |
| |) | |
| vs. |) | |
| |) | DECLARATION OF COUNSEL IN |
| ISAIAH JASON MAZA JR., |) | SUPPORT OF DEFENDANT'S SECOND |
| |) | UNOPPOSED MOTION TO CONTINUE |
| Defendant. |) | TRIAL |
| |) | |

I, Noah Horst, state under penalty of perjury under the laws of the United States of America pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I was appointed by the court to represent defendant Isaiah Maza on August 14, 2020 (Dkt. 12), effective August 6, 2020, relieving previous counsel, Assistant Federal Public Defender Susan Russell. I make this declaration in support of Defendant's First Unopposed Motion to Continue Trial.

2. The Court found Mr. Maza indigent pursuant to 18 U.S.C. § 3006(A)(b), and unable to pay for the costs of counsel, investigation, or experts to prepare a defense. Mr.

Maza is currently released on conditions and residing at the Oregon Trail Recovery Center at their inpatient dual diagnosis center (Dkt 23-25). Further, Mr. Maza has worked hard to complete his high school studies, has applied to college and has obtained full-time employment while on release.

3. Mr. Maza is indicted for alleged violations of 18 U.S.C. 111(a)(1) and (b) for allegedly assaulting a federal officer by means of a dangerous weapon, resulting in bodily injury, and with willfully injuring and committing depredation to property of the United States in an amount exceeding \$1,000 under 18 U.S.C. §§ 1361 and 1362. There are no co-defendants, but counsel understands that during a protest at the federal courthouse, other unknown individuals handed Mr. Maza a firework which he allegedly lit and threw into the federal courthouse, injuring a federal officer.

4. Trial is currently scheduled for January 26, 2021. (Dkt. 26) This is my second request for a trial continuance.

5. I need additional time to investigate the case, develop mitigation, negotiate with the government and prepare for trial.

6. I have discussed this continuance motion and the proposed trial date with Mr. Maza and he waives any Speedy Trial rights as guaranteed by 18 U.S.C. § 3161(c)(1) from the current January 26, 2021 trial until the trial date set by the court.

7. Gary Sussman, the Assistant United States Attorney assigned to this case, does not oppose this motion.

RESPECTFULLY SUBMITTED this 12th day of January, 2021.

/s/ Noah Horst
Noah Horst, OSB #076989
Attorney for Isaiah Maza